

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION

JO TANKERS, A.S. and JO TANKERS, B.V.,
§
§ CIVIL ACTION NO. 4:11-CV-00938
V. §
HBG LOGISTICS, LLC, HGB AGENCIES,
HOUSTON BECNEL, INC., ALBERT GARCIA,
KEITH BUFORD, JULIAN HOWARD

**ANSWER AND JURY DEMAND OF DEFENDANTS ALBERT E. GARCIA,
KEITH BUFORD AND HOUSTON BECNEL, INC.**

Defendants ALBERT E. GARCIA, KEITH BUFORD AND HOUSTON BECNEL,
INC. file this Answer to Plaintiffs' Original Complaint.

ADMISSIONS AND DENIALS

1. Defendants admit the allegations of paragraph 1.
2. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 2.
3. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 3.
4. Defendants deny the existence of any entity known as HBG Logistics, LLC and therefore deny the allegations of paragraph 4.
5. Defendants deny the existence of any entity known as HBG Agencies and therefore deny the allegations of paragraph 5.
6. Defendants admit the identity of the registered agent of Houston Becnel, Inc., but deny the remainder of the allegations of paragraph 6.

7. Defendants admit that Defendant Albert Garcia is an individual and a citizen of the State of Texas, but denies the remainder of the allegations of paragraph Defendant denies the allegations of Paragraph 7.
8. Defendants admit that Defendant Keith Buford is an individual and a citizen of the State of Texas, but denies the remainder of the allegations of paragraph Defendant denies the allegations of Paragraph 8.
9. Defendants admit that Defendant Julian Howard is an individual and a citizen of the State of Texas, but is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 9.
10. Defendants deny the allegations of Paragraph 10 as they relate to these specific Defendants.
11. Defendants deny the allegations of Paragraph 11 as they relate to these specific Defendants.
12. Defendants deny the allegations of Paragraph 12 as they relate to these specific Defendants.
13. Defendants deny the allegations of Paragraph 13 as they relate to these specific Defendants.
14. Defendants deny the allegations of Paragraph 14 as they relate to these specific Defendants..
15. Defendants deny the allegations of Paragraph 15 as they relate to these specific Defendants.
16. Defendants deny the allegations of Paragraph 15 as they relate to these specific Defendants.

17. Defendants deny Plaintiffs are entitled to the relief requested in Paragraph 17 labeled
PRAYER.

DEFENSES

18. Plaintiffs fail to state a claim upon which relief may be granted against these Defendants.

19. These Defendants were not involved in, and obtained no direct or indirect benefit from, any of the transactions and events described in Plaintiffs' complaint that serve as the basis for the asserted cause(s) of action.

20. These Defendants are not liable to Plaintiffs in the alleged capacities in which they are sued.

21. These Defendants assert that if any liability exists to Plaintiffs, that liability is due to the acts and omissions of Defendant **JULIAN HOWARD** and third party **JAMES DAUGHERTY**. Such acts and omissions were not authorized, condoned, adopted or ratified in fact or by operation of law by these Defendants.

JURY DEMAND

22. Defendant demands trial by jury.

PRAYER

23. For these reasons, Defendants ask the Court to enter judgment that Plaintiffs take nothing from these Defendants and that Defendants be awarded their costs and such other and further relief to which they may show themselves justly entitled.

Respectfully submitted,



Ed Wallison

S. District of Texas No. 4320
Texas State Bar No. 20792700
25511 Budde Rd, No. 601
The Woodlands, TX 77380
(281) 296-8900 Telephone
(281) 296-6970 Fax

OF COUNSEL:
Rathwell De Ford & Wallison, PC

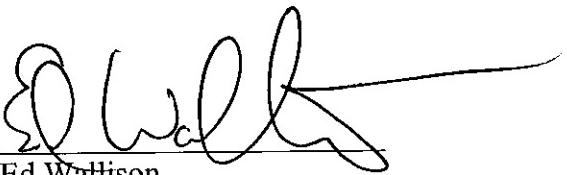
ATTORNEY IN CHARGE FOR
DEFENDANTS ALBERT GARCIA,
KEITH BUFORD, & HOUSTON
BECNEL, INC

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Answer was served on the following via fax and regular mail this 3/14 day of April, 2011.

William Durham
Mary Holmesly
20th Floor, Niels Esperson Bldg
808 Travis
Houston, TX 77002

Fax: 713-225-2907



Ed Wallison